BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Mail Processing Network
Rationalization Service Changes, 2012   Docket No. N2012-1

PUBLIC REPRESENTATIVE'S FIRST SET
OF INTERROGATORIES AND REQUESTS FOR PRODUCTION TO
UNITED STATES POSTAL SERVICE WITNESS SMITH (PR/USPS-T-9: 1-2)

(December 21, 2011)

Pursuant to 39 CFR 3001.25 through 3001.28, the Public Representative hereby submits the following interrogatories and requests for production of documents. Due to availability of the Public Representative and staff to review Postal Service answers, and the press of other business over the coming holidays, the Public Representative proposes that the witness provide answers no later than January 12, 2012, rather than the customary 14 days. Definitions and instructions included with the Public Representative's First Set of Interrogatories and Requests for Production to United States Postal Service, PR/USPS-1-3 dated December 21, 2011, are hereby incorporated by reference.

The Public Representative encourages the Postal Service to discuss issues of burden, privilege, relevance, or question clarity informally to obviate the need for objections or motions practice.

Respectfully Submitted,

/s/ Christopher J. Laver

Public Representative for
Docket No. N2012-1

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PR/USPS-T-9-1

Please refer to page 15 of your testimony, which states that witness Rosenberg says "there will be a reduced need for Biohazard Detection System cartridges." Please provide the source for this statement.

PR/USPS-T-9-2

Please provide electronic, machine-readable copies of Tables 9, 10, and 11 in your testimony that have links to Library References submitted either in this case, or the FY 2010 ACR. If other data sources were used, provide an electronic copy of the spreadsheets used, with links, and identify the source of data contained in other worksheets.